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FCC - MAILROOM

**national brands, inc.**

Representing . . .

Providing Quality Products with Quality Service

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Farberware  
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PUR  
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Toastermaster

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Vidal Sassoon  
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Water Pik

**Candles****Clock Manufacturers**

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**Communications**

Pay Telephones  
Operator Services

and many others . . .

**ORIGINAL**

December 6, 2004

*Chairman Michael Powell  
Federal Communications Commission  
The Portals  
445 12th Street, SW, TW-A325  
Washington, DC 20554*

**Re: Access to Unbundled Network Elements, WC Docket No. 03-225**

*Dear Chairman Powell:*

*I am writing to urge you to take action on the pending revision of the Unbundled Network Elements (UNE) rules. This is necessary to ensure that payphone companies like mine continue to have competitive alternatives for their local service needs.*

*As the Commission has long recognized, payphones pay a critical role in meeting the needs of the public for communications, especially in emergency situations. For many citizens, payphones are the only telephones they have available to them. That is why Congress mandated widespread availability of payphone service in the Telecommunications Act. To continue providing payphone service, my company must have reliable local service connections at a reasonable cost. This is because my local phone bill is my single largest monthly cost of operating my phones. To keep service quality high and costs low, we rely on the availability of competitive telephone companies for local service. Without competitive local service options like UNE-P, there is no market check on what we may be charged by the incumbent telephone company.*

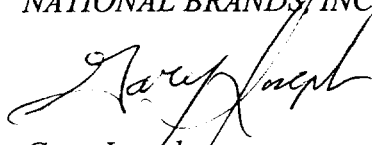
*For our payphones, the only competitive alternative that has proved effective to date is UNE-P. Our payphones do not transmit data and therefore do not need broadband channels; accordingly, broadband facilities do not provide a viable competitive alternative for our payphones. In the last few years, we have had to remove a large number of our payphones from service because their revenue was insufficient to meet operating costs. Without UNE-P, the American public is sure to lose more of the valuable payphone services they need and rely on today.*

*Chairman Michael Powell  
December 6, 2004  
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*Therefore, I urge you to take steps to ensure that the FCC's revised UNE rules preserve competitive local service alternatives for payphones. Thank you for your consideration.*

*Respectfully,*

*NATIONAL BRANDS, INC.*

A handwritten signature in dark ink, appearing to read "Gary Joseph", written over the printed name.

*Gary Joseph  
Vice President*

*GJ:dc*

*cc: Senator Jon L. Kyle  
Senator John McCain  
Representative Ed Pastor  
Representative Rick Renzi  
Representative John B. Shadegg  
Representative J.D. Hayworth  
Representative Jeff Flake  
Representative Raul M. Grijalva  
Representative Jim Kolbe  
Representative Trent Franks*